

April 29, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, submits this notice in the above-captioned proceedings of an ex parte meeting on April 28, 2003, with Jared Carlson, Deputy Chief of the Wireless Telecommunications Bureau Policy Division. The purpose of the meeting was to discuss OnStar's transition to digital technology and the December 3, 2002 petition filed by OnStar in the above captioned docket.

OnStar estimated, based on its total subscriber growth rate and the 911 calling patterns of its optional wireless calling service users, that the requested ruling would affect fewer than 11 to 13 calls per day (from an estimated 3.4 - 3.9 million units) to Phase II ready PSAPs by the end of 2006 and would decline steadily thereafter as planned fully Phase II capable units are phased-in.

OnStar noted that the estimate assumed subscriber retention rates over 50 percent, a three to four year front end weighted phase-in of the first and second generation digital units (e.g. 20, 70, 90 100 percent) and that 50 percent of the U.S. would be covered by Phase II calling.

OnStar suggested that as set forth in its petition and reply, it has shown that the requested ruling is narrow and addresses a unique situation that is significantly different from conventional handsets and not contemplated by the current rules. Moreover, OnStar believes the data show

that the impact will be minimal – a result that makes intuitive sense – since users of its optional wireless calling service must first subscribe to OnStar’s basic safety and security call center services that include nationwide location-based emergency and automatic airbag deployment/crash notification services. It was noted that this minimal impact will be even further moderated given OnStar’s expectation that the first generation digital units will have Advanced Forward Link Trilateralization (AFLT) capability for any 911 calls dialed using the optional wireless calling.

In response to a question about the number of vehicles registered in the United States, OnStar reported that according to the April 28, 2003 Automotive News there are about 220 million registered vehicles.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball
Vice President, Public Policy

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